

REMARKS

Applicant thanks the Examiner for withdrawing the rejections of record in the January 30, 2004 *Office Action*.

Applicant thanks the Examiner for considering the references cited with the Information Disclosure Statement filed April 29, 2004.

Applicant notes that an Information Disclosure Statement ("IDS") was filed on January 23, 2004, and requests that the Examiner consider the references cited therein and return an initialed copy of the PTO-1449 form filed with this IDS in the next Action.

Status of the Application

Claims 1-54 are all the claims pending in the Application. Claims 1-54 stand rejected.

Obviousness Rejection

The Examiner has rejected under 35 U.S.C. § 103(a): (1) claims 1-4, 7-14, 17-24 and 27-54 as being unpatentable over *Jamtgaard* (US 6,430,624 B1; hereinafter "*Jamtgaard*") in view of Lipkin (US ; hereinafter "*Lipkin*"); (2) claims 5, 15 and 25 as being unpatentable over *Jamtgaard* in view of *Lipkin* and *Maslov* (US 6,538,673; hereinafter "*Maslov*"); and (3) claims 6, 16 and 26 as being unpatentable over *Jamtgaard* in view of *Lipkin* and *Tadakoro et al.* (US 6,463,352; hereinafter "*Tadakoro*"). These rejections are respectfully traversed.

Independent Claims 1, 11 and 21

The Examiner alleges that *Jamtgaard* discloses many of the features recited in independent claims 1, 11 and 21, but concedes that *Jamtgaard* fails to teach or suggest "a method in which the transformation of an object consists of changing the value of that object"

(O.A., pgs. 3-4). Applicant agrees that *Jamtgaard* fails to teach or suggest such features, for at least the reasons discussed in the April 29, 2004 *Amendment*.

Nevertheless, the Examiner alleges that such features are disclosed by col. 69, line 1 - col. 71 line 15 of *Lipkin*. Further, the Examiner alleges that it would have been obvious "to have combined the methods of *Jamtgaard* with method [sic] of *Lipkin* because it would have allowed for a transformation to occur that was transparent to the user" (O.A., pg. 4).

Applicants respectfully disagree.

First, Applicant respectfully submits that the current rejection of independent claims 1, 11 and 21 is invalid on its face as the Examiner has not met his burden of rejecting with specificity. Specifically, the three columns of *Lipkin* that the Examiner has cited to support his rejection are actually directed to at least three different concepts in *Lipkin*. Thus, it is completely unclear as to which of these concepts that the Examiner is alleging discloses the recited features.

Second, Applicant respectfully submits that, in the section of *Lipkin* cited by the Examiner, the only portion of even moderate relevance is col. 69, lines 55-60, which indicates that a view stylesheet may be created by converting an XML document into a format that is understood by a desktop browser, *e.g.*, HTML. However, this conversion is clearly one of format (similar to *Jamtgaard*) - XML to HTML - and not of values. No modification of underlying values of any objects is disclosed in the cited portion. Thus, the cited portion of *Lipkin* is deficient with respect to the features of the independent claims for the same reasons as *Jamtgaard*.

Third, Applicant respectfully submits that even if *Lipkin* could be read as disclosing some value transformation (which it cannot) one of skill in the art at the time of the invention would not have been motivated to modify *Jamtgaard* to provide such functionality, as the Examiner has alleged. Specifically, *Jamtgaard* is directed to providing the same underlying data in different formats for different devices. Thus, it would make no sense to provide a function for changing the underlying data during a format change, as the resultant data would then be different for different devices.

Thus, Applicant respectfully submits that independent claims 1, 11 and 21 are patentable over the applied references. Further, Applicant respectfully submits that rejected dependent claims 2-10, 12-20 and 22-54 are allowable, *at least* by virtue of their dependency.

Additionally, Applicant respectfully submits that the remaining secondary references - *Maslov* and *Tadakoro* - fail to teach or suggest the features missing from *Jamtgaard* and *Lipkin*, as discussed above.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-54 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-54.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Response Under 37 C.F.R. § 1.116
U.S. Appln. No.: 09/512,738

Attorney Docket # A8642 /
ST9-99-151

Please charge any fees which may be required to maintain the pendency of this
application, except for the Issue Fee, to our Deposit Account No. 19-4880.

SUGHRUE MION, PLLC
2100 Pennsylvania Avenue, N.W.
Washington, D.C. 20037-3213
Telephone: (202) 293-7060
Facsimile: (202) 293-7860


WASHINGTON OFFICE

23373

CUSTOMER NUMBER

Date: March 31, 2005

Respectfully submitted,


Kelly G. Hyndman
Reg. No. 39,234

Timothy P. Cremen
Registration No. 50,855